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VIA ECFS & EMAIL

September 11, 2008

WILLIAM K. COULTER  
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Enforcement Bureau  
Telecommunications Consumers Division  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Attn: Marcy Greene

Re: iTalk Global Communications, Inc., 2007 CPNI Certification, Docket No. 06-36

Dear Ms. Greene:

Enclosed please find two (2) courtesy copies of the CPNI Certification submitted by iTalk Global Communications, Inc., today via ECFS in the above-referenced docket.

Should you have any questions, please contact me at 202-799-4440.

Sincerely,

A handwritten signature in cursive script that reads 'William K. Coulter'.

William K. Coulter  
Counsel to iTalk Global Communications, Inc.

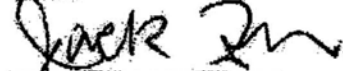
Enclosures

**iTalk Global Communications, Inc.**  
**Annual CPNI Certification**  
**EB Docket 06-36**

I, Jack Zhao, certify that I am an officer of iTalk Global Communications, Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules pursuant to 47 C.F.R. Section 64.2001 et seq.

Attached to the certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions against data brokers in the past year. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Jack Zhao, CEO  
iTalk Global Communications, Inc.  
August 26, 2008

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## STATEMENT REGARDING OPERATING PROCEDURES

### 1. Use of customer proprietary network information without customer approval.

iTalk uses individually identifiable CPNI for the provision of interconnected VoIP service from which the CPNI is derived, to provide customer support related to such service, and to bill and collect for such service. iTalk also uses individually identifiable CPNI to protect its rights or property, or to protect users of its interconnected VoIP service and other carriers from fraudulent, abusive, or unlawful use of or subscription to such services.

iTalk does not use individually identifiable CPNI for marketing. As a result iTalk does not use individually identifiable CPNI to market service offerings among the categories of service to which its customers already subscribe. iTalk does not use individually identifiable CPNI to track customers that call competing service providers.

### 2. Approval required and notification for use of customer proprietary network information.

As discussed above, iTalk uses individually identifiable CPNI to provide service, to provide support to customers of its service, and to bill and collect for its service. iTalk does not use or permit the use of individually identifiable CPNI in a way that would require approval. Thus, it is not necessary for iTalk to provide notice to its customers about customers' right to restrict use of, disclosure of, and access to their individually identifiable CPNI.

### 3. Safeguards required for use and disclosure of customer proprietary network information.

*Safeguarding CPNI.* iTalk has undertaken technical, operational and policy measures to discover and protect against attempts to gain unauthorized access to CPNI. Specifically, iTalk has taken steps to ensure that all access to CPNI is guarded by a password and those accesses granted by passwords are constrained so as to protect against breach and abuse. These protections are discussed in more detail below.

iTalk has undertaken development to provide tracking and auditing systems that record any access to CPNI attempted by an agent or customer and will store the data for a minimum of one year.

*In-Store access to CPNI.* iTalk does not allow any in-store access to CPNI.

*Telephone access to CPNI.* iTalk has undertaken policy and training measures for customer care representatives regarding the proper handling of CPNI information over the telephone. Customer care representative are trained to identify a customer without the use of readily available biographical information.

In most situations the customer care representative is able to call the customer back using a telephone number from the iTalk database that has been issued to the customer by iTalk, or previously registered with iTalk, by the customer, using their password.

In service cases where a registered telephone is not functional, the customer care representative may accept the customer's password as authentication. The customer care representative is permitted to initiate a password reset as described below, and is not permitted to divulge the password directly.

In situations where a registered telephone is not functional, and the customer can not provide their password, but is able to provide, without assistance from iTalk personnel, all of the call detail information necessary to address the customer care issue (i.e. the telephone number called, when it is called, and if applicable the amount charged for the call), then iTalk personnel are permitted to address that customer care issue.

*Online access to CPNI.* iTalk customers must provide a password to access CPNI online. For customers that purchase service online, establishment of a password for online access is part of the subscription process. For customers that subscribe over the telephone, a random password is generated and emailed to the customer.

*Password selection and reset.* During the initial subscription phase the customer is prompted to register a password. The same password is used for all future iTalk phone and online access. When a customer requests a password reset online, or on the phone with a customer care representative the password reset is handled using the email address registered by the customer at time of subscription. The email message may contain the password or an html link that walks the customer through the reset process.

*Notification of account Changes.* iTalk sends email notification of account changes to customers at their email address of record. Customers receive notice for changes to their password, PIN, security questions and address of record.

*Training/Discipline.* iTalk trains its employees and personnel as to when they are and are not authorized to use or access CPNI, and the company has an express disciplinary process in place in the event CPNI policies and procedures are not followed. Employees are subject up to and including termination of employment or access to CPNI if they conduct the access in a way that is not in compliance with FCC rules.

*Security Breaches.* iTalk fraud detection personnel are responsible to monitor the tracking and auditing data for possible breaches in CPNI data. iTalk trains its employees and personnel to report all suspected breaches of CPNI data to iTalk general counsel, chief engineer and CEO in order to ensure that security breaches may be handled in accordance with 47 CFR Part 64 Subpart U section 64.2011.